



**IN THE U.S. DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Amber Carney

*

*On behalf of herself and
others similarly situated*

*

*

Plaintiff

*

v.

Case No. 1:18-cv-00874 RDB

*

Sunset Grille, LLC, et al

*

Defendants

/

DECLARATION OF JORDAN S. LIEW

1. I, Jordan S. Liew, Esq., am at least 18 years of age and competent to testify, and I am not a party to, or related to a party, in this action. I am employed by Hoffman Employment Law, LLC, and serve as an associate to Howard B. Hoffman, counsel to the Plaintiffs in the above-referenced matter.
2. By way of brief background, I am an attorney in private practice, and I concentrate on employment law. I have been practicing law since 2016, after graduating from the Georgetown University Law Center. I am admitted to the Maryland bar (since 2016), the District of Columbia bar (since 2017), and was sworn into the bar of the U.S. District Court for the District of Maryland on June 22, 2018.
3. Prior to my employment with Hoffman Employment Law, LLC, I gained experience in employment law during my one-year tenure with the District of Columbia Office of Attorney General as a Charles F.C. Ruff Fellow. As an attorney with the Civil Litigation Division, I defended the District from claims of race, sex, and disability discrimination, hostile work environment, and retaliation. As an associate with Hoffman Employment

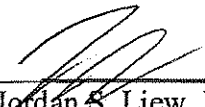
Law, I now focus almost exclusively on employment law cases, primarily those concerning unpaid wage violations involving the FLSA and related state statutes.

4. My total time in this case, through May 10, 2019 was 141.5 hours. The total value of this time is \$27,900.50. Aside from the review of documents and communications, and the requisite conferences with Howard B. Hoffman, opposing counsel, and the Court, I worked on several more complex tasks during this case. In August of 2018, I drafted the unopposed motion for conditional certification and the accompanying draft notices. In November and December of 2018, I interviewed Plaintiffs and extensively reviewed Defendants' discovery production for the purpose of determining damages. In January and February of 2019, I assisted in negotiating the settlement of this case by maintaining contact with Plaintiffs to assess their settlement positions, and determining alternative damage computations. Finally, in March of 2019, I drafted the settlement documents, including the Settlement Agreement and Joint Motion for Approval.
5. I have maintained time and costs records in this case, which I have placed into "RocketMatter"© software. The time records reflect actual time that I have expended in the prosecution of this litigation (the "RocketMatter" entries have not been placed into the Court's required lodestar billing format). I inputted my time promptly following work performed. To the fullest extent practical, I have specified the time spent per task, and I have avoided the practice of block billing.
6. The hourly rate claimed in this case, i.e., \$205/hour, is well within the range permitted by the U.S. District Court for the District of Maryland (Lodestar Guidelines). Magistrate Judge Charles B. Day approved my requested rate and observe it was "presumptively reasonable[.]" Dominguez v. Microfit Auto Parts, Inc. et al., 2019 WL 423403 at * 6 n.4

(D. Md. Feb. 4, 2019). It is also supported by primary counsel on this matter, Howard B. Hoffman, Esq., whose Declaration is marked as Exhibit 2.

DECLARANT FURTHER SAYETH NAUGHT

I solemnly affirm under the penalties of perjury that the contents of the foregoing declaration are true and correct.



Jordan S. Liew, Esq.
May 10, 2019